

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

VIRGINIA ELIZONDO,
Plaintiff,

v.

**SPRING BRANCH INDEPENDENT
SCHOOL DISTRICT, et al.,**
Defendants.

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Civil Action No. 4:21-cv-01997

**PLAINTIFF’S RESPONSE TO DEFENDANTS’ MOTION FOR LEAVE
TO EXTEND TIME FOR RESPONSE TO DKT. 122**

Plaintiff Virginia Elizondo responds to Defendants’ Motion for Leave to Extend Time for Response to Dkt. 122 (“motion”) and would respectfully show the Court the following:

1. Defendants’ stated reasons for requesting that the Court extend the time in which they are to file “a single member district plan providing for the election of school board trustees” have morphed and changed over the past three days.

2. Before receipt of today’s Motion, Defendants’ counsel had not invoked their conflicting professional obligations as a basis for relief. Motion, ¶8. Had they done so, as a matter of professional courtesy, Plaintiff’s counsel would not have objected to their request. Now that they have done so, Plaintiff withdraws her opposition to Defendants’ request.

3. However, the various other excuses Defendants earlier made for refusing to comply with the Court’s directive do not warrant the relief requested. *See* the colloquy of counsel in Exhibits 1, 2, 3 and 4, attached.

As a matter of professional courtesy, based on Defendants’ counsel’s representations about their conflicting trial obligations, Plaintiff does not oppose Defendants’ request.

Respectfully submitted,

/s/ Barry Abrams

Barry Abrams
State Bar No. 00822700
SD Tex. Bar No. 2138
Robert Scott
State Bar No. 17911800
SD Tex. Bar No. 3085
Domingo Llagostera
State Bar No. 24070157
SD Tex. Bar No. 1120040
BLANK ROME LLP
717 Texas Avenue, Suite 1400
Houston, Texas 77002
(713) 228-6606
(713) 228-6605 (fax)
barry.abrams@blankrome.com
bob.scott@blankrome.com
domingo.llagostera@blankrome.com

Martin Golando
State Bar No. 24059153
Admitted Pro Hac Vice
THE LAW OFFICE OF MARTIN
GOLANDO, PLLC
2326 W. Magnolia
San Antonio, Texas 78201
(210) 471-1185
(210) 405-6772 (fax)
martin.golando@gmail.com

COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on May 1, 2025, a true and correct copy of Plaintiff's Response to Defendants' Motion for Leave to Extend Time for Response to Dkt. 122 was served on Defendants' counsel via the Court's ECF system.

/s/ Barry Abrams

Barry Abrams